

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.  
GENERAL MOTORS CORP., *et al.*, : 09-50026 (REG)  
Debtors. : (Jointly Administered)  
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**OBJECTION TO CURE AMOUNT  
OF TIMCO, LLC**

Timco, LLC, by and through its undersigned counsel, hereby files its objection to cure amount, for the reasons and in the amount stated on the Addendum annexed hereto and made a part hereof.

Respectfully submitted,

**SHELDON S. TOLL PLLC**  
Attorney for Timco, LLC

By:

  
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Dated: June 12, 2009

6/10/09

## ADDENUM TO GM/TIMCO LLC TRADE AGREEMENT

In addition to the pre and post petition "Cure Amount" for production parts shipped to GM, TIMCO shall also be paid for a \$132,443 Cancellation Cost due to General Motors post petition decision to resource the current model GMT610 Cooling Fan business from TIMCO to another supplier.

Detail of this cost is:

Finished Goods: 1,850 <u>pcs.</u> @ <u>11.35</u> ea=	\$20,430
Work in Process: 1,150 @ \$7.25 ea=	\$8,338
Resin: 6,000 <u>lbs.</u> @ <u>1.35</u> /lb=	\$8,100
Metal Inserts: 5,500 pcs. @ \$4.75 ea=	\$26,125
Freight in:	\$3,600
Packaging: 2,500 <u>boxes</u> @ <u>\$5.75</u> ea=	\$14,370
Employee Training & Development Costs:	\$8,880
Mold Retro fit:	\$3,500
Balance Machine Retrofit:	\$1,800
Transportation of Tooling:	\$1,500
Transportation of Packaging:	\$1,500
Transportation of Inventories:	\$1,500
Mold Set-ups:	\$6,500
Part Development:	\$12,000
PPAP Costs:	\$2,800
Premium O'time Costs:	<u>\$11,500</u>
Totals:	\$132,443